

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

*Caption in Compliance with D.N.J. LBR 9004-1(b)*

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Rojas, Jr., Cielo Terrazas, Heidy Terrazas, Lluvia  
Soto, Maria C. Soto, and Maria F. Soto*

In re:

**Fastline Cargo, LLC d/b/a/ FLC,**

Debtor.

Chapter 11

**Case No. 24-17484-ABA**

**NOTICE OF MOTION OF BRYAN ORTIZ  
FOR RELIEF FROM AUTOMATIC STAY  
PURSUANT TO 11 U.S.C. § 362(d)**

PLEASE TAKE NOTICE that on November 5, 2024, Bryan Ortiz, Fidel Ernesto Rojas, Jr., Cielo Terrazas, Heidy Terrazas, Lluvia Soto, Maria C. Soto, and Maria F. Soto filed their *Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. §362 (d)* (“Motion”) with the United States Bankruptcy Court for the District of New Jersey which seeks relief from the automatic stay.

PLEASE TAKE FURTHER NOTICE that any objection to the Motion must be filed on or before November 26, 2024, at 4:30pm (EDT), (“Objection Deadline”) with the United States Bankruptcy Court for the District of New Jersey, Martin Luther King, Jr. Bldg & Court House, 50 Walnut Street, Newark, NJ 07102. At the same time, you must serve a copy of the objection upon the undersigned counsel for Movants so as to be received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on December 3, 2024, at 10:00 a.m. (EDT) before the Honorable Andrew B. Altenburg in the United States Bankruptcy Court for the District of New Jersey, if any objection is filed.

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the Motion in advance of the hearing for the purpose of determining whether a consent order may be entered and/or for the purpose of stipulating to relevant facts such as the amount of available insurance coverage, and the extent and validity of any security interest.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OF HEARING.

OBERMAYER REBMANN MAXWELL & HIPPEL, LLP

By: /s/ Brett Wiltsey  
Brett Wiltsey, Esq.  
1120 Route 73, Suite 420  
Mount Laurel, NJ 08054  
*Counsel for Movant Bryan Ortiz*

Dated: November 5, 2024